

Ladies and Gentlemen of the Commission:

I appreciate this opportunity to express my opposition to the proposed use of US power lines for broadband data distribution.

While it certainly presents some exciting possibilities, the fact is that the widespread implementation of BPL's would create a level of interference on frequencies between 1.5 and 30 MHz that would seriously impair or render inoperable vital services such as: space research (5,10, 15, and 25 MHz allocations), radio astronomy (where a low noise floor is critical), various HF military applications, US time and frequency standards such as WWV and WWVH, long distance maritime and aeronautical communications and navigation, international shortwave broadcasts (such as our own Voice of America), low-channel television broadcast stations, and the bulk of long-distance US amateur radio communications (seen by many as a key element of Homeland Security).

Studies supporting this contention have been done in a number of countries, including Japan, Finland, Germany and the United Kingdom. Japan has postponed implementation of BPL's, as the effects of interference are deemed "hazardous to HF operations"¹. In Finland, the Finnish Telecommunications Minister has rejected the use of power lines for broadband data transmission². The British Broadcasting Corporation has stated that existing interference limitations on BPL's (such as those proposed in SE35) fail to offer adequate protection to broadcast reception. A White Paper from the BBC's Research & Development department³ concluded that interference from BPL's can only be tolerated by severely limiting power line emissions from broadband devices; even then, HF broadcast users will have to accept a "compromise in receiver performance".

In short, unless a specific frequency allocation is made for BPL's that allow them to co-exist with other HF spectrum users, this technology should not be implemented, as the widespread RF noise pollution that would occur throughout the nation would simply be unacceptable.

Thank you for your time.

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¹ http://www.soumu.go.jp/joho_tsusin/eng/Releases/Telecommunications/news020809_3.html

² <http://www.darc.de/referate/emv/plc/plc-oh.pdf>

³ <http://www.bbc.co.uk/rd/pubs/whp/whp-pdf-files/WHP013.pdf>